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• -DE, JR.

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ISAS  
MOSCH

**AILEY  
ROBERTS**

.. ROBERTS\*  
E. BONE\*\*

IVIN ROSENBERG  
ERNEST B. BOSS

\*ADMITTED IN TEXAS ONLY  
\*\*ADMITTED IN PENNSYLVANIA ONLY  
\*\*\*ADMITTED IN KANSAS ONLY

RM 5091

**RETIRED**

**SPECIAL COUNSEL**

~~TELECOMMUNICATIONS~~ CONSULTANT

WATER'S NUMBER

**JAN - 8 1991**

**Federal Communications Commission  
Office of the Secretary**

**Ms. Donna R. Searcy**  
**Secretary**  
**Federal Communications Commission**  
**1919 M Street, N.W.**  
**Washington, D.C. 20554**

**Dear Ms. Searcy:**

Transmitted herewith on behalf of Valley Public Television, Inc. are an original and 5 copies of its Petition For Rule Making concerning the amendment of Section 73.606(b) of the Commission's Rules & Regulations pertaining to the Table of TV Allotments.

Should there be any questions, please communicate with the undersigned.

Very truly yours,

**FLETCHER, HEALD & HILDRETH**

Lonna M. Thompson  
Counsel for  
Valley Public Television, Inc.

LMT:ik  
Enclosure

cc: Karl A. Kensinger, Esquire; Clay Pendarvis, Esquire [both  
with enclosure]

RECEIVED

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

JAN - 8 1991

Federal Communications Commission  
Office of the Secretary

|                                |   |                      |
|--------------------------------|---|----------------------|
| Matter of                      | ) |                      |
|                                | ) |                      |
| Amendment of Section 73.606(b) | ) | MM Docket No. _____  |
| Table of Allotments            | ) | RM <u>8091</u>       |
| TV Broadcast Stations          | ) | MM Docket No. 85-390 |
| (Ridgecrest, California)       | ) |                      |

Directed to: Chief, Allocations Branch

PETITION FOR RULE MAKING

Valley Public Television, Inc. ("Valley"), by its attorneys, hereby petitions the Commission to institute or, alternatively, to complete a rule making proceeding for the purpose of amending Section 73.606(b) of the Rules, the Table of TV Allotments, as follows:

|                        | <u>Allotments</u> |                    |
|------------------------|-------------------|--------------------|
| <u>Community</u>       | <u>Existing</u>   | <u>Proposed 1/</u> |
| Ridgecrest, California | *25               | *41                |

In support thereof, the following is submitted:

1. Valley is the licensee of educational television station KVPT, Channel \*18, Fresno, California. Valley has pending an application for a construction permit for a new noncommercial education television station on Channel \*39, at Bakersfield, California (File No. BPET-900904KF).

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1/ The Commission itself proposed such a change in a Notice of Proposed Rule Making, in MM Docket 85-390, released December 18, 1985.

2. The facility Valley is proposing in its Channel \*39 Bakersfield application is slightly short-spaced to the reference point coordinates of Channel \*25 at the U.S. Post Office in the center of Ridgecrest, California, an isolated community located in the desert area of eastern California.<sup>2/</sup> Allotment of Channel \*41 to Ridgecrest would eliminate the short spacing of Valley's Channel \*39 application vis-a-vis the reference point of Channel \*25. As set forth in the Moffet, Larson & Johnson Engineering Exhibit filed with Valley's request for waiver of the spacing requirements regarding its Channel \*39 application, Channel \*41 could be used at Ridgecrest at the city reference point coordinates without any short spacing concerns. (A copy of the Engineering Exhibit is attached hereto.)<sup>3/</sup> Of particular importance is the fact that the allocation of Channel \*41 to Ridgecrest will maximize the efficient use of Channel \*39 in Bakersfield, release Channel \*25 for use elsewhere and still continue an educational television channel allocation at Ridgecrest, a result clearly mandated by Section 307(b) of the Communications Act of 1934, as amended. 47 U.S.C. 151, et seq.

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<sup>2/</sup> Valley has filed a request for waiver of the separation rule. While the request fully demonstrates that the rule should be waived, the instant rule making request would remove the short spacing altogether.

<sup>3/</sup> The Engineering Exhibit also demonstrates that Channel \*25 could be used at Ridgecrest with a site restriction that would clear Valley's superior coverage proposal to be authorized on Channel \*39 without any short spacing concerns. If the Commission prefers, as an alternative to allotting Channel \*41 to Ridgecrest, the Commission could impose a site restriction on Channel \*25.

3. Section 307(b) is also best served by allowing Valley to proceed with the location of its facilities on Channel \*39 as proposed without concern for the slight short-spacing to Ridgecrest, since a significant number of persons who would otherwise not be served will receive Valley's proposed signal. In contrast to the coverage proposed in the mutually exclusive application for Channel \*39 filed by Community Television of Southern California ("Community"), which will cover 332,293 persons in an area of 8,932 sq. km., Valley's coverage would reach 421,000 persons and an area of 12,370 sq. km., a difference of 88,707 persons (21% more) and an area of 3,438 sq. km. (27.8% greater), including persons and areas now largely unserved by an educational television station.

4. Another factor to be considered is that Channel \*25 now allocated at Ridgecrest cannot be currently used because of the ATV Freeze Order.<sup>4/</sup> Indeed, even long before the ATV Freeze Order, there was never any interest shown in Channel \*25. In fact, there has been no interest shown by any party in operating a station on Channel \*25 in Ridgecrest for the entire twenty-five years since its allocation on February 9, 1966.

5. Allocation of Channel \*41 to Ridgecrest does not pose any technical problems and would have no adverse effect on any other allocations or operating stations. This is evident from the fact that the Commission, itself, made this proposal several

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<sup>4/</sup> Advanced Television Systems, Mimeo No. 4074, released July 17, 1987) ("ATV Freeze Order").

years ago. In a Notice of Proposed Rule Making, in MM Docket No. 85-390, released December 18, 1985, the Commission proposed substituting Channel \*41 for Channel \*25 in Ridgecrest (and substituting Channel 25 or channels 51 and 57 in Ventura). Although the Report and Order in this proceeding, released September 30, 1987, did not, for other reasons, allocate Channel \*41 to Ridgecrest, it did allocate Channels 51 and 57 to Ventura and delete Channel 41. The Report and Order is under reconsideration, and Channel \*41 still remains in the Commission's data base as being considered for allotment to Ridgecrest. Therefore, there are no technical problems in allotting Channel \*41 to Ridgecrest in terms of compliance with the FCC spacing and other requirements. As noted, by proposing the deletion of Channel 25 and the substitution of Channel \*41 at Ridgecrest in MM 85-390, the Commission has already made the determination that such an allocation would be in the public interest.

6. Section 307(b) of the Act requires that channel efficiency be maximized. The Commission can do so by maximizing the use and coverage of Channel \*39 by eliminating any short spacing concerns regarding Channel \*25 through allocation of Channel \*41 to Ridgecrest. "That the Commission's allocation standards are designed to effect an equitable and efficient distribution of radio facilities is axiomatic." Moberly Broadcasting Co., 5 R.R.2d 273, 280 (Rev. Bd. 1965) (emphasis in original) (the need for the service must be analyzed, and the statutory standard of Section 307(b) cannot be ignored).

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9. By allocating Channel \*41 to Ridgecrest, the Commission will maximize flexibility and efficiency in the use of Channel \*39 at Bakersfield, while not depriving Ridgecrest of any service whatsoever through the allocation of a replacement channel to Ridgecrest.

WHEREFORE, the premises considered, Valley requests that the Commission initiate a rule making proceeding to substitute Channel \*41 for Channel \*25 at Ridgecrest, California. Alternatively, Valley requests that the Commission act upon that portion of the pending reconsideration of Docket 85-390 so as to permit the substitution of Channel \*41 for Channel \*25 at Ridgecrest. By so doing, both the Bakersfield and Ridgecrest communities would be served to the fullest extent.

Respectfully submitted,

VALLEY PUBLIC TELEVISION, INC.

By:

  
Richard Hildreth

By:

  
Lonna M. Thompson

Its Attorneys

FLETCHER, HEALD & HILDRETH  
1225 Connecticut Avenue, N.W.  
Suite 400  
Washington, D.C. 20554  
(202) 828-5700

January 8, 1991

**EXHIBIT I**



ENGINEERING REPORT

**MOFFET, LARSON & JOHNSON, INC.**

5203 LEESBURG PIKE

CONSULTING TELECOMMUNICATIONS ENGINEERS

FALLS CHURCH, VA 22041

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ENGINEERING EXHIBIT

IN SUPPORT OF THE APPLICATION BY

VALLEY PUBLIC TELEVISION, INC.

FOR A

NON-COMMERCIAL BROADCAST STATION

IN

BAKERSFIELD, CALIFORNIA

FCC FILE NUMBER BPET-900904KF

November 5, 1990

MOFFET, LARSON & JOHNSON, INC.

5203 LEESEBURG PIKE

CONSULTING TELECOMMUNICATIONS ENGINEERS

FALLS CHURCH, VA 22041

Valley Public Television, Inc.  
Bakersfield, California

ENGINEERING STATEMENT

This Engineering Exhibit has been prepared on behalf of Valley Public Television, Inc. (VPT), an applicant for a new non-commercial broadcast station in Bakersfield, California (FCC File Number BPET-900904KF), in support of a request for waiver of Paragraph 73.610 and Paragraph 73.698, Table II of the FCC Rules.

The proposed VPT transmitter site is 9.8 kilometers short-spaced to the city reference coordinates of an unused Channel \*25 allotment at Ridgecrest, California. Exhibit 1 is an allocation study for Channel \*25 at Ridgecrest, California. Exhibit 2 shows the permissible site area for the Channel \*25 allotment and the restriction that the VPT proposal would place on the Channel \*25 site area. As shown on Exhibit 2, grant of the VPT proposal would not preclude the use of Channel \*25 at Ridgecrest and an ample permissible site area would remain to the east of Ridgecrest.

Exhibit 3 is an allocation study for Channel 41 at Ridgecrest, California which would be available for use at the Ridgecrest city reference coordinates.

Moffet, Larson, & Johnson, Inc.

Page: 1

Date: 11/05/90

Study Name : Ridgecrest, California

Channel : 25a

Coordinates : N 35 37 30.0 W 117 40 12.0

Separations : TV Zone 2 - Full Service

| Call               | City           | & | State Stat | File - number  | Chan  | ERP  | HAAT | Zn | Latitude   | Longitude   | Bear  | Dist   | Req'd | Clear  |
|--------------------|----------------|---|------------|----------------|-------|------|------|----|------------|-------------|-------|--------|-------|--------|
| --- kilometers --- |                |   |            |                |       |      |      |    |            |             |       |        |       |        |
| KGET               | BAKERSFIELD    |   | CA LIC     | DLCT 790529KF  | 17z   | 5000 | 1400 | 2  | 35 26 20.0 | 118 44 23.0 | 258.2 | 99.19  | 31.4  | 67.79  |
| KSCI               | SAN BERNARDINO |   | CA LIC     | DLCT 2579      | 18-   | 3334 | 2380 | 2  | 34 11 15.0 | 117 41 53.5 | 180.9 | 159.49 | 95.7  | 63.79  |
| KERO TV            | BAKERSFIELD    |   | CA LIC     | DLCT 305       | 23-   | 1760 | 3700 | 2  | 35 27 14.0 | 118 35 37.0 | 257.4 | 85.88  | 31.4  | 54.48  |
|                    | RIDGECREST     |   | CA ALC     |                | * 25z |      |      | 2  | 35 37 30.0 | 117 40 12.0 | 239.9 | .00    | 280.8 | -280.8 |
| KMPH               | VISALIA        |   | CA LIC     | DLCT 781115KF  | 26+   | 2950 | 2730 | 2  | 36 17 12.0 | 118 50 20.0 | 305.3 | 128.49 | 87.7  | 40.79  |
| KMPH               | VISALIA        |   | CA CPH     | BNPCT 891114KE | 26+   | 3214 | 2570 | 2  | 36 40 2.0  | 118 52 42.0 | 317.2 | 158.74 | 87.7  | 71.04  |
| KBAK TV            | BAKERSFIELD    |   | CA LIC     | DLCT 2317      | 29z   | 1700 | 3730 | 2  | 35 27 11.0 | 118 35 25.0 | 257.3 | 85.61  | 31.4  | 54.21  |
| NEW                | BAKERSFIELD    |   | CA APP     | BPET 900904KF1 | * 39- | 162  | 3596 | 1  | 35 27 14.0 | 118 35 37.0 | 257.4 | 85.88  | 95.7  | -9.82  |
| NEW                | BAKERSFIELD    |   | CA APP     | BPET 881012KE1 | * 39- | 310  | 1332 | 2  | 35 26 17.0 | 118 44 23.0 | 258.2 | 99.21  | 95.7  | 3.51   |
|                    | BAKERSFIELD    |   | CA ALC     |                | * 39- |      |      | 2  | 35 22 31.0 | 119 1 16.0  | 257.6 | 125.68 | 95.7  | 29.98  |
| KTONTV             | SANTA ANA      |   | CA LIC     | DLCT 830418KH  | 40z   | 631  | 2890 | 2  | 34 13 27.0 | 118 3 44.0  | 193.0 | 159.48 | 119.9 | 39.58  |

EXHIBIT 1

117° 45'

117° 30'

117° 15'

Ch.25

RIDGECREST, CA

MAP SHOWING PERMISSIBLE SITE AREA

NOVEMBER 1990

MOFFET, LARSON & JOHNSON, INC.

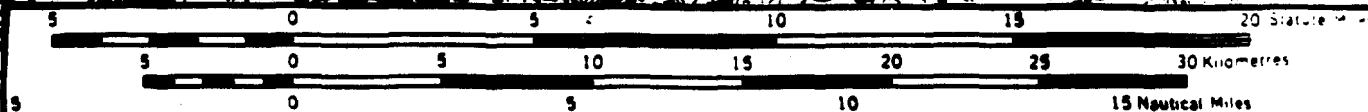
35° 45'

CITY  
REFERENCE COORDINATES

35° 30'

SEPARATION ARC  
FROM BPET 900904KF

EXHIBIT 2



Moffet, Larson, & Johnson, Inc.

Page: 2

Date: 11/05/90

Study Name : Ridgcrest, California

Channel : 41n

Coordinates : N 35 37 30.0 W 117 40 12.0

Separations : TV Zone 2 - Full Service

| Call               | City            | & | State | Stat | File - number    | Chan | ERP  | HAAT | Zn | Latitude     | Longitude   | Bear  | Dist   | Req'd | Clear |
|--------------------|-----------------|---|-------|------|------------------|------|------|------|----|--------------|-------------|-------|--------|-------|-------|
| --- kilometers --- |                 |   |       |      |                  |      |      |      |    |              |             |       |        |       |       |
| D86-172            | LOS ANGELES     |   | CA    | PADD |                  | 26z  |      |      |    | 1 34 3 15.0  | 118 14 28.0 | 196.8 | 181.92 | 119.9 | 62.02 |
| KMPH               | VISALIA         |   | CA    | LIC  | BMLCT 781115KF   | 26+  | 2950 | 2730 | 2  | 36 17 12.0   | 118 50 20.0 | 305.3 | 128.49 | 119.9 | 8.59  |
| KMPH               | VISALIA         |   | CA    | CPH  | BMPCT 891114KE   | 26+  | 3214 | 2570 | 2  | 36 40 2.0    | 118 52 42.0 | 317.2 | 158.74 | 119.9 | 38.84 |
| KNEXTV             | LOS ANGELES     |   | CA    | LIC  | BLCT 790118LF    | 34z  | 1950 | 2940 | 2  | 34 13 35.0   | 118 3 56.0  | 193.2 | 159.31 | 95.7  | 63.61 |
| NEW                | BAKERSFIELD     |   | CA    | APP  | BPET 900904KF1 * | 39-  | 162  | 3596 | 1  | 35 27 14.0   | 118 35 37.0 | 257.4 | 85.88  | 31.4  | 54.48 |
| NEW                | BAKERSFIELD     |   | CA    | APP  | BPET 881012KE1 * | 39-  | 310  | 1332 | 2  | 35 26 17.0   | 118 44 23.0 | 258.2 | 99.21  | 31.4  | 67.81 |
| KTBNV              | SANTA ANA       |   | CA    | LIC  | BLCT 830418KH    | 40z  | 631  | 2890 | 2  | 34 13 27.0   | 118 3 44.0  | 193.0 | 159.48 | 87.7  | 71.78 |
|                    | YOSEMITE VALLEY |   | CA    | ALC  |                  | 41z  |      |      |    | 2 37 44 42.0 | 119 35 12.0 | 324.6 | 291.02 | 280.8 | 10.22 |
| KDOBT              | BAKERSFIELD     |   | CA    | LIC  | BLCT 881229KF    | 45+  | 5000 | 1325 | 2  | 35 26 20.0   | 118 44 24.0 | 258.2 | 99.22  | 31.4  | 67.82 |
| KDOCTV             | AMANEIN         |   | CA    | LIC  | BLCT 821028KF    | 56-  | 2820 | 2390 | 2  | 34 11 14.0   | 117 42 1.0  | 181.0 | 159.52 | 119.9 | 39.62 |

EXHIBIT 3

## MOFFET, LARSON &amp; JOHNSON, INC.

5203 LEEBOURG PIKE

CONSULTING TELECOMMUNICATIONS ENGINEERS

FALLS CHURCH, VA 22041

Valley Public Television, Inc.  
Bakersfield, California

A F F I D A V I T

COUNTY OF FAIRFAX )  
 ) SS:  
COMMONWEALTH OF VIRGINIA )

MICHAEL B. DEGITZ, being duly sworn upon oath deposes and says:

That he is corporate secretary of the firm of Moffet, Larson & Johnson, Inc., consulting telecommunications engineers;

That this firm has been retained by Valley Public Television, Inc. to prepare this engineering statement;

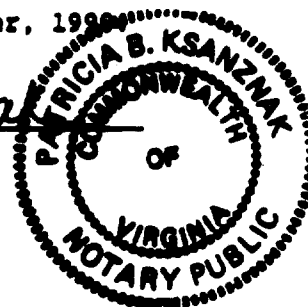
That he has either prepared or directly supervised the preparation of all technical information contained in this engineering statement; and that the facts stated in this engineering statement are true of his knowledge, except as to such statements as are herein stated to be on information and belief, and as to such statements he believes them to be true.

  
Michael B. Degitz

Subscribed and sworn to before me this 5th day of November, 1990

  
Notary Public

My Commission expires September 13, 1991.



Valley Public Television, Inc.  
Bakersfield, California

A F F I D A V I T

COUNTY OF FAIRFAX )  
 ) SS:  
COMMONWEALTH OF VIRGINIA )

WALLACE E. JOHNSON, being duly sworn upon oath deposes and says:

That his qualifications are a matter of record with the Federal Communications Commission:

That he is a registered professional engineer in the Commonwealth of Virginia and the District of Columbia and is the President of the firm of Moffet, Larson & Johnson, Inc.;

That this firm has been retained by Valley Public Television, Inc. to prepare this engineering statement;

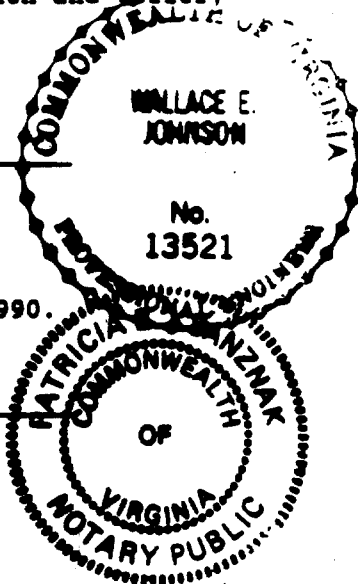
That he has either prepared or directly supervised the preparation of all technical information contained in this engineering statement; and that the facts stated in this engineering statement are true of his knowledge, except as to such statements as are herein stated to be on information and belief, and as to such statements he believes them to be true.

Wallace E. Johnson  
Wallace E. Johnson

**Subscribed and sworn to before me this 5th day of November, 1990.**

Patricia S. Kozymak  
Notary Public

**My Commission expires September 13, 1991.**



coverage requirements. Further, the requested assignment can be made without requiring additional changes or substitutions in the FM Table of Assignments and without conflict to any other known proposed rulemaking.

2. The allocation of FM Channel 266A at Cusseta, Georgia, will provide that community with its first local transmission service. Cusseta, Georgia, located in Chattahoochee County, had a 1980 Census population of 1,218 persons. In addition it should be noted that Chattahoochee County currently has no locally licensed transmission service, despite having a population of 21,732 persons (1980 Census).

3. Upon issuance of an Order by the Commission, allocating Channel 266A to Cusseta, Georgia, Chattahoochee County Broadcasting will promptly prepare and file the necessary application with the Commission and, having obtained authorization to do so, will promptly construct the facilities requested.

4. Therefore, inasmuch as the proposed allocation would provide service to a community and county, which currently have no local transmission service, and can be implemented in compliance with Commission Rules, Chattahoochee County Broadcasting urges the Commission to promptly issue a Notice of Proposed Rulemaking, proposing the allocation of FM Channel 266A to Cusseta, Georgia, as requested herein.

WHEREFORE, for the foregoing reasons, the Commission should amend Section 73.202 of its Rules by allocating FM Channel 266A

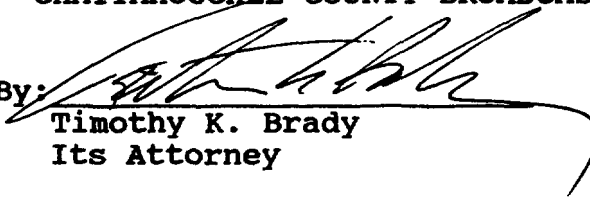


to Cusseta, Georgia.

Respectfully Submitted,

CHATTAHOOCHEE COUNTY BROADCASTING

By:

A handwritten signature in dark ink, appearing to read 'Timothy K. Brady', is written over a horizontal line.

Timothy K. Brady  
Its Attorney

P.O. Box 986  
Brentwood, TN 37027-0986  
(615) 371-9367

September 10, 1992

# ENGINEERING STATEMENT

CUSSETA, GEORGIA

FM CHANNEL 266A

for

Chattahoochee County Broadcasting

The attached engineering study of channel 266A for Cusseta, GA was performed using the Commission's separation criteria contained in 47 C.F.R. Section 73.207, Minimum Distance Separation Between Stations. This study indicates that channel 266A can be assigned to Cusseta, Georgia 1/ with the reference point 2/ situated at the city-center.

## DISCUSSION

An FM channel search on channel 266A at the Cusseta, GA center-city coordinates indicates that this channel would maintain the required separation distances to all facilities afforded protection by the Commission. See Exhibit I: FM Channel Separation Study.

---

1/ Coordinates for Cusseta, GA are N 32-18-18; W 84-46-30

2/ Proposed coordinates for channel 266A are N 32-18-18; W 84-46-30

A clearance map for channel 266A of the Cusseta, GA vicinity reveals that there is adequate land available to accommodate the antenna tower without short spacing any facilities afforded protection by the Commission's rules. See Exhibit II.

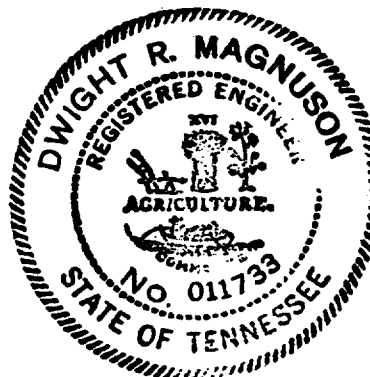
At maximum facilities (6 kw ERP; 100m HAAT) a class A city-grade contour will cover approximately 15.5 kilometers from the antenna site. Therefore it is quite possible to provide Cusseta, GA with the required city-grade signal from a transmitter site within the clearance area shown on Exhibit II.

Having demonstrated that this proposal ~~meets~~ the separation requirements of 47 CFR 73.207 and that it also meets the city-grade coverage requirements of Section 73.315, the public interest will be served by allotting channel 266A to Cusseta, Georgia.



Dwight R. Magnuson, P.E.

Dated: SEPT 4, 1992



# EXHIBIT I

\*\*\*\*\*

## FM CHANNEL SPACING STUDY

\*\*\*\*\*

Job title: Cusseta, GA

Channel: 266A

Database file name: d:\fccdata\fm920730.edx

Latitude: 32 18 18

Longitude: 84 46 30

Pre-1989 Class A spacings?: N

| CH    | Call   | Record | City          | ST | Status | Bear. | Dist. | Reqd. Dist. | Result |
|-------|--------|--------|---------------|----|--------|-------|-------|-------------|--------|
| 266C1 |        | 6640   | Valdosta      | GA | USED   | 140.4 | 206.7 | 200.0       | 6.7    |
| 266C1 | WAFT   | 6651   | Valdosta      | GA | LIC    | 140.4 | 206.7 | 200.0       | 6.7    |
| 267C2 | WQIL   | 6697   | Chauncey      | GA | CP     | 87.3  | 154.0 | 106.0       | 48.0   |
| 267C2 |        | 6707   | Chauncey      | GA | USED   | 91.1  | 157.2 | 106.0       | 51.2   |
| 265A  | WPGAFM | 6713   | Perry         | GA | LIC    | 73.8  | 101.5 | 72.0        | 29.5   |
| 265A  |        | 6722   | Perry         | GA | USED   | 73.8  | 101.5 | 72.0        | 29.5   |
| 269A  |        | 6723   | Warner Robins | GA | USED   | 70.4  | 112.7 | 31.0        | 81.7   |
| 269A  | WRCCFM | 6735   | Warner Robins | GA | LIC    | 70.4  | 112.7 | 31.0        | 81.7   |
| 264A  |        | 7306   | Cuthbert      | GA | USED   | 181.5 | 59.3  | 31.0        | 28.3   |
| 264A  | WDRL   | 7307   | Cuthbert      | GA | CP     | 183.3 | 59.8  | 31.0        | 28.8   |
| 269A  |        | 7324   | Albany        | GA | USED   | 142.2 | 96.0  | 31.0        | 65.0   |
| 269A  | WKAK   | 7332   | Albany        | GA | LIC    | 142.2 | 96.0  | 31.0        | 65.0   |
| 268C  | WKHXFM | 7384   | Marietta      | GA | LIC    | 13.5  | 171.5 | 95.0        | 76.5   |
| 268C  |        | 7406   | Marietta      | GA | USED   | 13.5  | 171.5 | 95.0        | 76.5   |
| 267A  |        | 8011   | Dothan        | AL | USED   | 203.4 | 133.0 | 72.0        | 61.0   |
| 267A  | WJJN   | 8023   | Dothan        | AL | LIC    | 203.5 | 133.5 | 72.0        | 61.5   |
| 266A  |        | 8029   | Elba          | AL | USED   | 228.7 | 149.6 | 115.0       | 34.6   |
| 266A  | WZTZ   | 8046   | Elba          | AL | LIC    | 228.7 | 149.6 | 115.0       | 34.6   |
| 213C3 | WFRC   | 8061   | Columbus      | GA | LIC    | 308.3 | 27.9  | 12.0        | 15.9   |
| 265A  | WCJM   | 8062   | West Point    | GA | LIC    | 331.4 | 74.7  | 72.0        | 2.7    |
| 265A  |        | 8068   | West Point    | GA | USED   | 331.4 | 74.7  | 72.0        | 2.7    |
| 265A  | WCJM   | 8072   | West Point    | GA | CP     | 331.6 | 74.8  | 72.0        | 2.8    |
| 263C  |        | 8104   | Anniston      | AL | USED   | 325.0 | 179.9 | 95.0        | 84.9   |
| 263C  | WHMAFM | 8113   | Anniston      | AL | LIC    | 325.0 | 179.9 | 95.0        | 84.9   |
| 265C2 | WALX   | 8684   | Selma         | AL | LIC    | 272.4 | 197.8 | 106.0       | 91.8   |
| 266C  |        | 8784   | Cullman       | AL | USED   | 317.5 | 284.9 | 226.0       | 58.9   |
| 266C1 | WFMHFM | 8802   | Cullman       | AL | LIC    | 317.5 | 284.9 | 200.0       | 84.9   |
| 266C  | WFMHFM | 8803   | Cullman       | AL | CP     | 315.5 | 279.7 | 226.0       | 53.7   |

\*\*\*\*\* End of channel 266 study \*\*\*\*\*



AREA FOR FM SITE  
Cusseta, GA 266A

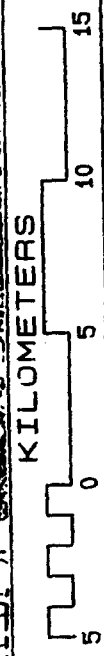


EXHIBIT II